REMARKS

Favorable reconsideration of this application is respectfully requested in view of the following remarks.

By way of this Amendment, new Claims 11-20 are presented for consideration. Claims 11, 12 and 14-18 are readable on the elected species. Claims 1, 2 and 4-8 remain readable on the elected species.

The subject matter of this application pertains to a vehicle seat assembly comprising a seatback, a seat cushion, a link mechanism that supports the seat cushion, and a drive unit for driving the ling mechanism and moving the seat cushion between the seating position and a stowed position. When the seat cushion is moved between the seating position and the stowed position, the seat cushion and the seatback maintain a constant posture through operation of the link mechanism and the drive unit.

As discussed in the present application, other known vehicle seat assemblies that are adapted to be stored in a concave storage space formed in the vehicle floor are configured to include a lock device that is adapted to be released to permit the seat assembly to be retracted into the concave storage portion. With these known seat assemblies, once the lock device is released, a user manually moves the seat to retract the seat into the concave portion in the vehicle floor. These known seat assemblies are somewhat cumbersome in that they require a relatively complicated operation to move and store the seat within the concave storage portion. In addition, the user must support a portion of the weight of the seat as the seat is retracted into the concave portion (i.e., the seat is not configured in a way that maintains the seat in a constant posture not requiring such support while being stored within the

concave storage space). The vehicle seat assembly at issue here is able to maintain a constant posture due to operation of the link mechanism and drive unit when the seat assembly moves between the seating and stowed positions and so a user is not required to support a part of the weight of the seat assembly and thus can operate the seat assembly at a distance from the seat assembly.

The Official Action sets forth rejection of independent Claim 1, and various dependent claims, based on the disclosure contained in U.S. Patent No. 6,370,141 to *Moon et al.* This document discloses a power assisted vehicle seat assembly that includes a seatback frame 24 and a lower seat frame 34. The seatback frame 24 includes side elements 25, 26 interconnected by an upper element 27. A slider pin 57 is attached to each of the side elements 25, 26 and slidably engages curved slots 54 formed in respective slotted members 50. The slotted members 50 are pivotally connected to upper floor mounting brackets 30 that are fixed to the vehicle floor. The ends 62 of respective rear links 58 are pivotally attached to intermediate pivot points 64 on the slotted members 50. The forward end of the lower seat frame 34 is supported by a pair of legs 44 whose ends are pivotally attached to lower floor mounting brackets 51. The vehicle seat assembly is also provided with a seatback recliner 72 and a drive motor/gear reduction device 76 for adjusting the reclined position of the seatback 24 and for collapsing the seatback 24 to the position illustrated in Figs. 5 and 6. The recliner 72 adjusts the reclined position of the seatback 25 relative to the vehicle floor and also folds the seatback 24 to the horizontal position when driven by the motor/gear reduction device 76.

One of the differences between the vehicle seat assembly at issue here and the disclosure in *Moon et al.* is that the vehicle seat assembly as issue here utilizes,

together with the other claimed features, a four-link mechanism that supports the seat cushion as now set forth in Claim 1. The drive unit drives this four-link mechanism and moves the seat cushion between the seating position and the stowed position. When the seat cushion is moved between the seating position and the stowed position, the seat cushion and seatback maintain a constant posture through operation of the four-link mechanism and the drive unit.

In *Moon et al.*, the lower seat frame 34 is supported by the two legs 44 and the floor mounting brackets 30. This arrangement disclosed in *Moon et al.* does not form a four-link mechanism. Rather, the arrangement described in *Moon et al.* merely defines a construction in which the lower legs 44 and the mounting brackets 30 support the seat cushion at three pivot points.

The Official Action also relies upon U.S. Patent No. 5,597,205 to *Glance et al.* for its disclosure of certain details of a driving mechanism. However, the disclosure in this document does not make up for the deficiencies pointed out above with respect to the disclosure contained in *Moon et al.* Thus, a combination of the disclosures in *Moon et al.* and *Glance et al.* would not have directed one to construct a vehicle seat assembly having the combination of features recited in independent Claim 1.

New independent Claim 11 defines that the vehicle seat assembly comprises a seatback, a seat cushion, a link mechanism that supports the seat cushion, and a motor-operated drive unit that drives the link mechanism and moves the seat cushion between a seating position and a stowed position, wherein when the seat cushion is moved between the seating position and the stowed position, the seat

cushion and seatback maintain a constant posture through operation of the link mechanism and the drive unit.

The claimed vehicle seat assembly recited in independent Claim 11 differs from the vehicle seat assembly disclosed in *Moon et al.* in that *Moon et al.* does not disclose a motor-operated drive unit that drives a link mechanism and moves the seat cushion between a seating position and a stowed position. In *Moon et al.*, the seat cushion is manually moved between the seating position and the stowed position. While *Moon et al.* discloses a drive unit 76, this drive unit adjusts the reclining position of the seatback and does not drive a link mechanism to move the lower seat frame 34 between a seating position and a stowed position. It is thus respectfully submitted that the vehicle seat assembly recited in independent Claim 11, and the various dependent claims, is also allowable.

Early and favorable action with respect to this application is respectfully requested.

Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful

in resolving any remaining issues pertaining to this application the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

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